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December 11, 2023

Honorable Judge Denise Cote  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

RE: *Tereshchenko v. Karimi*  
Case No: 23-cv-2006

Dear Judge Cote:

We represent Petitioner Roman Terenschenko in the above referenced proceeding and write this letter in response to Respondent's request for an adjournment of tomorrow's status conference.

Respondent's counsel, Ms. Valentina Shaknes, emailed requesting an adjournment on Friday, December 8, 2023, stating that they would like to adjourn the status conference to Wednesday or Thursday this week. I gave my consent and provided my availability though I never received a response afterwards. Now, it seems that Respondent has brought on her third (and possibly fourth) law firm to represent her in this case. We have received no further information that Ms. Shaknes or her firm are no longer representing Respondent.

Moreover, pursuant to Your Honor's Individual Practices, Section 1(E), requests for an adjournment should be made 48 hours prior to the scheduled appearance and should provide additional information as delineated. Most importantly perhaps is the position of the adversary. Our position, which we communicated to Respondent's new counsel is that we would object to any adjournment beyond this week.

In light of the recent letter filed by Petitioner detailing the custodial order made by the Ukrainian Court, it is important that this matter proceed as expeditiously as possible, which is mandated by the Convention. Convention, art. 2.

We thank the Court for its time and consideration of the matter.

Respectfully Submitted,

  
Richard Min

cc: All counsel (via ECF)